



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 25, 2020

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **United States v. Michael Hild,**
19 Cr. 602 (RA)

Dear Judge Abrams:

Application granted. The Court adopts the parties' proposed schedule.

SO ORDERED.

Ronnie Abrams, U.S.D.J.
August 25, 2020

The Government and counsel for defendant Michael Hild jointly and respectfully write in advance of the April 12, 2021 trial in this matter to propose an agreed-upon schedule governing pre-trial matters. The parties respectfully request that the Court adopt the following proposed schedule:

1. Pre-trial motions due by November 16, 2020;
2. Responses to pre-trial motions due by December 4, 2020;
3. Replies to pre-trial motions due by December 11, 2020;
4. Expert disclosure by all parties and defense notice of any advice of counsel defense or intent to rely on privileged material due by February 15, 2021;
5. The Government's 404(b) notice due by March 1, 2021;
6. The Government's witness list and exhibit list due by March 8, 2021;
7. Motions *in limine*, requests to charge, and voir dire due by March 11, 2021 (previously set by the Court);
8. The Court notes that the Government intends to voluntarily produce *Giglio* and 3500 material by March 15, 2021, subject to an agreement in principle to reasonable authenticity and/or business records stipulations;

